

Appl. No. 10/813,409  
Amdt. Dated March 24, 2008  
Reply to Office Action of January 24, 2007

## REMARKS

### Amendments to the claims

Claims 1, 7-10 and 15 have been amended to more explicitly and correctly express the present invention.

### **Claim Rejections – 35 USC § 102**

*Claims 1-3, 5, 7, 9, 11, and 15-17 are rejected under 35 U.S.C. §102(b) as being anticipated by Beck et al (US Patent No. 6, 518, 086).*

### With regard to claims 1-3, 5, 7, 9, 11, and 15-17:

Amended claim 1 recites, in part:

“A method of manufacturing an electromagnetic interference shield comprising the steps of: ...

(4) applying a voltage to the target modules using a power supply, thus sequentially activating a magnetron sputtering process between the respective target modules and the substrate, and thereby sequentially depositing a first metal layer, a second metal layer, and a **stainless steel layer** from the target modules onto the substrate until a desired thickness is achieved on the substrate.”

In response of this rejection, applicant has amended claim 1, and respectfully submits that Beck et al. does not disclose or suggest that a **first metal layer, a second metal layer and a stainless steel layer are sequentially deposited from the target modules onto the substrate**, as per amended claim 1.

Beck et al. essentially discloses a method of producing thin-film-based semiconductor devices of group IB-III A-VIA on a substrate in a vacuum for use in photovoltaic applications. The method

Appl. No. 10/813,409  
Amdt. Dated March 24, 2008  
Reply to Office Action of January 24, 2007

of Beck et al. includes a stage of depositing a precursor comprising one or more layers onto a substrate. **Each layer of the precursor is formed by co-depositing a group VIA element and a group IB and/or a group IIIA element**, such that the group VIA and the group IB and/or group IIIA elements co-exist in the deposited precursor layer. This precursor is then heated to form the semiconductor material. (col. 5, ll. 8-22)

Unlike the method of Beck et al., in the method of amended claim 1, a stainless steel layer is formed on an outside surface of the substrate. Main materials of the stainless steel layer are not in group VIA, IB, or IIIA. Therefore, amended claim 1 is submitted to be novel and unobvious over Beck et al., and withdrawal of the rejection and allowance of the claim 1 are respectfully requested.

Claims 2, 3, 5, 7, 9 and 11 depend on claim 1, and should also be allowable, since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 2, 3, 5, 7, 9 and 11 are respectfully requested.

Amended Claim 15 recites, in part:

"A method of manufacturing an electromagnetic interference shield comprising the steps of: ...

(3) applying a voltage to the target modules using a power supply, thus sequentially activating a magnetron sputtering process between the respective target modules and the substrate, and thereby sequentially depositing **a first metal layer, a second metal layer, and a stainless steel layer** from the target modules onto the substrate until a desired thickness is achieved on the substrate."

Similarly to claim 1, applicant has amended the claim 15 and

Appl. No. 10/813,409  
Amdt. Dated March 24, 2008  
Reply to Office Action of January 24, 2007

respectfully submits, for the same reasons set forth above, that Beck et al. does not disclose or suggest that target is made from a **first metal layer, a second metal layer and a stainless steel layer are sequentially deposited from the target modules onto the substrate**, as per amended claim 15. Therefore, the method of amended claim 15 is not taught or suggested by Beck et al. Therefore, the method of amended claim 15 nor the structure yielded by such a method is not taught or suggested by Beck et al., and withdrawal of the rejections and allowance of the claim 15 is respectfully requested.

Claims 16-17 depend on claim 15, and should also be allowable since each includes the patentably distinguishing features of claim 15. Reconsideration and withdrawal of the rejection of claims 16-17 are respectfully requested.

#### **Claim Rejections – 35 USC § 103**

*Claims 4 and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1 and 15 above, further in view of Heeks et al. (US Patent No. 6559593).*

#### With regard to claims 4 and 18:

Claims 4 and 18, respectively, depend on claims 1 and 15 and should also be allowable, since each includes the patentably distinguishing features of claims 1 and 15. Reconsideration and withdrawal of the rejection of claims 4 and 18 are respectfully requested.

*Claims 6 and 19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1 and 15 above, and further in view of Wickersham, Jr. et al. (US Patent No. 7, 087, 142).*

Appl. No. 10/813,409  
Amdt. Dated March 24, 2008  
Reply to Office Action of January 24, 2007

With regard to claims 6 and 19:

Claims 6 and 19, respectively, depend on claims 1 and 15 and should also be allowable, since each includes the patentably distinguishing features of claims 1 and 15. Reconsideration and withdrawal of the rejection of claims 6 and 19 are respectfully requested.

*Claims 8, 10 and 12-14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1, 7, and 11 above, and further in view of Kobayashi (Japanese Patent No. 63270452).*

With regard to claims 8, 10 and 12-14:

Claims 8, 10 and 12-14 depend on claim 1 and should also be allowable, since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 8, 10 and 12-14 are respectfully requested.

In view of the foregoing, the present application as claimed in the pending claims is considered to be in a condition for allowance, and an action to such effect is earnestly solicited.

Appl. No. 10/813,409  
Amdt. Dated March 24, 2008  
Reply to Office Action of January 24, 2007

### CONCLUSION

Applicants submit that the foregoing Amendment and Response place this application in condition for allowance. If Examiner believes that there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an Examiner's amendment, please call the undersigned at 714.626.1240.

Respectfully submitted,  
Ga-Lane Chen

By 

**Andrew C. Cheng**

Registration No.: 60,891

Customer No. 25,859

Foxconn International, Inc.

P.O. Address: 1650 Memorex Drive, Santa Clara, CA 95050

Tel. No.: (714) 626-1240